

**IN THE UNITED STATES DISTRICT COURT  
FOR EASTERN DISTRICT OF PENNSYLVANIA**


THE MIDDLE EAST FORUM	:	CIVIL ACTION
	:	
	:	NO. 2:19-cv-05030-JDW
Plaintiff,	:	
	:	
v.	:	
	:	
LISA REYNOLDS-BARBOUNIS	:	
	:	
Defendant.	:	
	:	

**DECLARATION OF LISA REYNOLDS-BARBOUNIS**

I Lisa Reynolds-Barbounis who resides at 1820 Kilbourne Place, Northwest, Washington D.C. 20010, in the United States of America do hereby make OATH and say at follows:

1. My name is Lisa Reynolds-Barbounis.
2. Today is March 1, 2021.
3. I traveled to England to witness how the Tommy Robinson Rally went in June 2018. The Middle East Forum paid for half the price of my airfare and I was responsible to pay for the remaining costs to travel during this June 2018 trip.
4. The next time I traveled to England was in October 2018. This was also a trip I took related to my work with MEF. Accordingly, MEF agreed to pay for the cost of my airfare, lodging and nominal expenses. The entire trip for related to my position with MEF as I went to be the MEF delegate and speak on stage.
5. I traveled to England three more times after the October 2018 trip. All three times were at my own expense as I went for purely personal reasons on my own time.
6. I was not compensated in any way by MEF for my travel to England after the October 2018 trip.
7. I used Paid Time Off and traveled to England at my own expense for every trip I took after October 2018.

8. As I have stated at more than one deposition, I have no knowledge to substantiate the allegation that Daniel Thomas stole any money from The Middle East Forum.
9. The only person who made any allegations about Daniel Thomas was Jazmin Bishop. She made these allegations and then quickly recanted them by informing me that she discovered that Daniel Thomas had received money from other sources and that she was incorrect in her allegations involving the Forum.
10. I did not believe Jazmin Bishop as she made the allegation about Daniel Thomas almost six months to a year after the money was granted and only when she was angry and making many other false allegations.
11. I swear under penalty of perjury that the foregoing is accurate, true and correct.

Signature of Declarant: 

Name of Declarant: Lisa Barbounis

Date: March 1, 2021

# **Exhibit A**